Electronically FILED by Superior Court of California, County of Los Angeles on 07/17/2019 10:27 AM Sherri R. Carter, Executive Officer/Clerk of Court, by M. Wong,Deputy Clerk

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SUPERIOR COURT OF THE STATE OF CALIFORNIA - COUNTY OF LOS ANGELES

NORTH CENTRAL DISTRICT - GLENDALE

UNLIMITED CIVIL

Northern California Collection Service, Inc., *Plaintiff,* v. Resourceful Developments, Inc., *Defendant.*	Case No: EC068574 **AMENDED** Notice of Motion and Motion by Plaintiff Northern California Collection Service, Inc. for Terminating Sanctions, or in the alternative for Evidentiary Sanctions, and to Impose Monetary Sanctions; & Court Order/Receipt Page & Proof of Service Hearing: ~~7/19/19~~ 9/20/19 Time: 8:30 a.m. Dept: D, Judge Ralph Hofer. **RES ID: 119442316521** Complaint Filed: 6/8/18 Trial: 1/27/20

September 20

NOTICE IS GIVEN that on Friday, ~~July 19~~, 2019, at 8:30 a.m., in Department D of the above-entitled Court located at 600 East Broadway, Glendale, California, plaintiff Northern California Collection Service, Inc. will move the Court upon the Code of Civil Procedure Section 2023.010 (g), 2023.030 (d)(1), and 2030.300 (e) grounds for an order imposing terminating sanctions on defendant Resourceful Developments, Inc. by striking its answer to the complaint for its disobedience of this Court's order to serve further responses to plaintiff's Form Interrogatories, Set One, number 15.1 regarding defendant's 32 affirmative defenses.

In the alternative, plaintiff will move the Court upon Code of Civil Procedure Section 2023.010 (g), 2023.030 (c), and 2030.300 (e) grounds for an order imposing evidence sanctions on defendant Resourceful Developments, Inc. by prohibiting it from supporting any of its thirty-two affirmative defenses at trial.

In addition, plaintiff Northern California Collection Service, Inc. will move this Court upon the Code of Civil Procedure section 2030.300 (e) grounds for an order imposing monetary sanctions against defendant Resourceful Developments, Inc., or its attorney of record Ryan Stubbe, or both, in the amount of $3,147.30.

Plaintiff's motion is based on this notice of motion, memorandum of points and authorities, the declaration of Andre J. LeLievre, requests for judicial notice and exhibits thereto, including the this Court's order of May 10, 2019, the papers, records, and file herein, and such evidence as may be properly presented at the hearing of this motion.

If Department D publishes a tentative ruling, it can be found at the Court's website http://www.lacourt.org/tentativeRulings/ui/TentativeRulings.aspx.

The motion should be granted.

Dated: 7-17-19

Andre J. LeLievre, Attorney for Plaintiff Northern

From: noreply@ecourt.com <noreply@ecourt.com>
To: lelievreaj <lelievreaj@aol.com>
Subject: Rescheduled: EC068574 - 119442316521
Date: Fri, Jul 12, 2019 4:05 pm

The following reservation has been rescheduled by the COURT:

Event: Motion for Terminating Sanctions
Reservation ID: 119442316521
Status: RESCHEDULED
Case Number: EC068574
Case Title: NORTHERN CALIFORNIA COLLECTION VS RESOURCEFUL DEVELOPMENTS
Courthouse: Glendale Courthouse
Dept: Department D
Previous Date: 07-19-2019 at 08:30:00 AM
Reschedule To: 09-20-2019 at 09:00:00 AM
Motion Count: 1

Click the link below to view the reservation. You may need to supply your PIN
number. From here you may print receipt and attach it to the corresponding
motion/document as the last page. Indicate the Reservation ID on the motion/document face page. The document will not be accepted without the
receipt page and the Reservation ID.

@notifyBaseUrl/?q=calendar/search&crsNumber=119442316521

Proof of Service

My name is Andre J. LeLievre and my business address is 700 Leisure Lane, Sacramento, California. I am a resident of Sacramento County where the mailing occurred. I am over the age of 18 years and not a party to the cause. I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service; and correspondence is deposited with the United States Postal Service that same day in the ordinary course of business. On the date below at 700 Leisure Lane, Sacramento, California, I placed for deposit in the United States Postal Service the

* **AMENDED** Notice of Motion and Motion by Plaintiff Northern California Collection Service, Inc. for Terminating Sanctions, or in the alternative for Evidentiary Sanctions, and to Impose Monetary Sanctions

[XX] (BY MAIL) placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in a United States Postal Service mailbox at Sacramento, California, addressed as shown below.

JAURIGUE LAW GROUP
Ryan Stubbe
300 West Glenoaks Boulevard, Suite 300
Glendale, CA 91202

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration was executed in Sacramento, Sacramento County, California.

Date: 2-17-19

Andre J. LeLievre